

REMARKS

By this amendment, claims 1-32 are pending, in which claims 1, 2, 4, 6, 7, 9, 11, 14, 16, 17, 19, 21, 22 and 24 are currently amended. Care was exercised to avoid the introduction of new matter.

The Office Action mailed September 24, 2004 rejected claims 1-32 under 35 U.S.C. § 102 based on *Okanoue* (US 6,307,843).

Independent claims 1, 16 and 21, as amended, recite "forwarding the query **over a wide area network** to a remote computer system to retrieve the address information, if the address information is not stored in the memory." Amended independent claim 6 recites "the processor being configured to forward the query **over the wide area network** to a remote computer system to retrieve the address information." Independent claim 11 now recites "a server communicating with the terminal **over a wide area network**, the server being configured to receive the query from the terminal and to transmit the address information corresponding to the query to the terminal."

By contrast, *Okanoue* discloses (see Abstract, FIG. 1, col. 2: 49 - col. 3: 8) an ad hoc **local area network** 10 that is temporarily formed of multi-channel wireless mobile hosts 11 to 15. Each of the mobile hosts comprises a link table having a plurality of entries each comprising a host name, a link identifier indicating one of the wireless links, a network layer address and a data link layer address. Each mobile host is responsive to an entered destination host name for making a search through the link table, transmitting a frame containing the network layer and data link layer addresses of an entry of the link table on one of the wireless links which is indicated by the link identifier of this entry if this entry contains the destination host name. If the link table does not contain the destination host name, the mobile host scans the wireless links, broadcasts a link table request message on one of the scanned wireless links, receives a remote link table.

Accordingly, the *Okanoue* system operates by exchanging link tables over the "ad hoc **local area network**." The claimed invention, however, recites "forwarding the query **over a wide area network** to a remote computer system to retrieve the address information." Surely, the Examiner must recognize the technical distinctions (e.g., the differences in protocols, hardware platforms, and etc.) between a network designed for local area use versus one that is developed for as a wide area network. For example, local area networks possess strict limitations on transmission distances, and in the case of wireless LANs

transmission power is limited. Thus, the claimed feature of "a wide area network" is patentably distinguishable from the ad hoc local area network of *Okanoue*.

As regard, independent claims 26 and 30, claim 26 recites "selectively forwarding the query **over the satellite network** to a server to retrieve the address information," and claim 30 recites a "processor being configured to forward the query **over a satellite network** to a server to retrieve the particular address information." A thorough study of *Okanoue* reveals no mention of the term "satellite." This, in part, explains why the Office Action is forced to rely on the term "mobile" to somehow imply a teaching of a satellite (see page 3, Office Action). This explanation appears to suggest that the general term "mobile" discloses all related concepts and systems in which mobility is a characteristic or a benefit, running afoul any basis for the Examiner to give the claim language its broadest reasonable interpretation. The reasoning presented by the Office Action has no grounding in law or fact. There is no law supporting the proposition that generalizations can be made from a reference so as to implicitly teach all specific concepts.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed in a prior art reference, based on the foregoing, it is clear that *Okanoue* fails to anticipate independent claims 1, 6, 11, 16, 21, 26 and 30.

Hence, claims 2-5, 7-10, 12-15, 22-25, 27-29, 31 and 32, depending correspondingly from claims 1, 6, 11, 16, 21, 26 and 30, are also allowable for the reasons proffered for the allowability of these independent claims. Further, the dependent claims are allowable on their own merits. For example, dependent claim 5, 10, 15, 20, 25 and 32 each recites use of a "**multicast** message" to pre-load the memory. After careful study of *Okanoue*, Applicants conclude that this cited reference is completely silent with respect to the term "multicast." This, however, does not deter the Examiner from concocting a rejection based on concepts that appear to relate to the claim language. In this instance, the Examiner conveniently equates "broadcast" to the claimed feature of "multicast" by citing col. 2: 2-28. The cited passage states the following: (*Emphasis Added*):

Otherwise, the mobile host scans the wireless links, **broadcasts** a link table request message on one of the scanned wireless links, receives a remote link table containing the destination host name, and transmits a frame containing network layer and data link layer addresses of the remote link table on the wireless link on which the remote link table was received.

The Examiner's interpretation is technically flawed, as broadcast requires transmission to all hosts, while a multicast is to a subset of the hosts. The engineering challenges required for selective transmission to the subset of hosts should not be trivialized by the Examiner. Thus, the feature of "multicast" is patentably distinguishable from the broadcast function of the *Okanoue* system.

Therefore, the present application, as amended, overcomes the rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (301) 601-7252 so that such issues may be resolved as expeditiously as possible. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Plastrik", followed by the date "1-24-05" written in a similar cursive style.

Craig L. Plastrik
Attorney for Applicant(s)
Registration No. 41,254

HUGHES ELECTRONICS CORPORATION
Patent Docketing Administration
P.O. Box 956
Bldg. 1, Mail Stop A109
El Segundo, CA 90245-0956